

R8 RRT Meeting – GKM Session Justification

BACKGROUND

The Regional Response Team (RRT) is created by/required by the NCP regulations.

The RRT membership consists of 14 federal agencies (including DOI, USDA, FEMA, HHS, etc) and R8 states (Colorado, Montana, Utah, Wyoming, North Dakota and South Dakota).

The RRT has two major functions:

1) conduct regional planning and set regional policy relative to oil/hazardous substance response. This includes development of the Regional Contingency Plan (RCP), which defines our (EPA + RRT member agency) notification procedures and “rules of engagement” for incident coordination.

2) respond with assets, technical assistance or other items as needed/requested by the FOSC. Coordination among members is vital for these two functions.

Per NCP regulation, the RRT is required to meet at least twice per year.

Our Emergency Response and Preparedness Program is designed to respond to hazardous substance and oil releases. By coordinating with our federal, state, tribal and local response partners, we hope to prevent any such situation but we also conduct numerous planning and coordination meetings with our partners to be best prepared when spills occur. Our standard protocols require us to take every opportunity to learn and improve our responses but this is also just wise business practice. The RRT forum is one in which we should identify vulnerabilities and gaps and address them for future spills, small and large scale. Another large incident could happen any day, next month or several years from now. In the event of another large scale release we must respond, whether we've had the benefit of improving our response, coordination and capabilities through open frank discussion or not. It would be best if we had those lessons learned, improved protocols and greater trust with our RRT partners, IMT and our responders within our region and others before the next incident occurs.

NEED

R8's next RRT meeting is scheduled for October 21-22. The meeting agenda currently includes various topics.

We have the ability to call an “executive session” to limit participants to federal/state representatives.

We would like to add Gold King Mine (GKM) to the meeting agenda. This would include some discussion of the incident, EPA's response and coordination between RRT agencies. This would likely also lead to discussion about initial lessons learned and how the RRT can better coordinate and function on future incidents.

JUSTIFICATION

GKM is the “elephant in the room.” If we do not discuss this incident with our RRT response partners during the meeting; it will be obvious we are avoiding the topic. Further, avoiding the GKM topic discredits the RRT and will make it more difficult to get federal and state participation and collaboration. This will also complicate the next large incident because we will have missed the opportunity to benefit from lessons learned (not talking about GKM with the RRT means we cannot improve our response protocols with state and federal agencies also impacted by oil/hazardous substance incidents). Similarly, if we do discuss the site, we need to be able to defend/discuss actions/inactions to fully identify and address lessons learned and increase the effectiveness of the RRT and our overall response.

Per OSWER directive, we are now required to update the aforementioned RCP to ensure notification procedures are well defined and thorough. We are also required to exercise these notification procedures. In order to meet OSWER timelines for this, we need to discuss procedures at the October 2015 meeting. However, it will be difficult/impossible to have this discussion without the overall GKM discussion to identify areas for improvement.

Lastly, other regions and HQ OEM are making plans to discuss GKM during their RRT meetings and other events; some plan to discuss improvements and are asking for R8 participation. In order for us to participate in these events, it makes better sense for us to have some of our own regional discussions first.